

**LGAC Letter on Office of Air and Radiation Proposed National Program Guidances  
For Fiscal Years 2022-2023 - DRAFT**

December 9, 2020

The Honorable Andrew R. Wheeler  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Dear Administrator Wheeler:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to provide early input on the Office of Air and Radiation's (OAR) planning process as it develops its FY2022-2023 National Program Guidances (NPG).

We understand the NPG communicates key implementation expectations for EPA regions, states, tribes, local governments and territories, includes measures by which progress will be assessed, and guides the annual grant work planning process. In response to input from a variety of partners, OAR has streamlined the guidance narrative and air program measures over the past several guidance cycles. OAR is planning to build on these improvements with its FY 2022-2023 Guidance, which has an expected issuance in late spring 2021.

OAR requested the LGAC's feedback on the following specific questions:

- 1) What activities at the local government level should EPA identify to help us achieve our long-term performance goal of reducing the number of non-attainment areas?
- 2) Are there streamlining opportunities that you see for the National Program Guidance that would help its utilization?
- 3) What local circumstances should EPA better address in its National Program Guidance (e.g., prescribed burning)?

The LGAC is pleased to offer the following recommendations:

The LGAC supports the EPA's goal that the 2022-2023 NPG reflect OAR's overriding long-term strategic goal of reducing nonattainment areas nationwide. The jurisdictions of several LGAC members are designated as nonattainment or may be designated so in the future. The LGAC encourages the EPA to consider the impacts of air pollutants that travel across local, state, or national borders. Localities cannot regulate or reduce air pollution generated by sources in a neighboring area; therefore, the EPA should factor this in when making attainment determinations. For example, Jefferson County, Colorado, is designated as nonattainment, but an air monitoring station at the National Renewable Energy Lab shows that some emissions originate in nearby counties. Similarly, the city of Hickory, NC, discovered

after doing analysis that many of its emissions are generated at power plants along the Ohio River. A third example is in Santa Cruz County, Arizona, along the U.S.-Mexico border. About 4,000 diesel trucks carrying fresh produce enter the area from Mexico per day. This contributes to the nonattainment status of the county.

In addition to considering cross-jurisdictional air pollution, the LGAC encourages the EPA to account for the fact that air pollution can be caused by natural phenomenon and natural background conditions. For example, Santa Cruz County, Arizona, is located in a desert. This means there is a significant amount of natural background dust, which contributes to particulate matter (PM) readings. Also, in Jackson County, Mississippi, the coastal bayous naturally emit substances that contribute to air pollution.

Regarding local circumstances that EPA should better address in its NPG, the LGAC recommends the Agency make additional accommodations for prescribed burning. In some parts of the country, such as Mississippi, there are many forested areas that undergo prescribed burns as a maintenance measure. These burns help prevent wildfires, but they also result in unavoidable air pollution. For example, because of this kind of pollution, Jackson County, Mississippi, has requested that the EPA exempt it when considering the stringency of air quality standards.

The LGAC appreciates the opportunity to provide early input into the EPA's National Program Guidances for FY 2022-2023. The LGAC looks forward to a final version and the opportunity to provide further input.